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November 13, 1998

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

**VIA HAND DELIVERY**

Ms. Magalie Salas  
Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

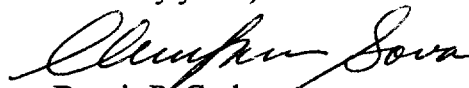
**Re: Sensormatic Electronics Corporation's  
Comments in Response to Petition for Rulemaking,  
Docket No. RM-9375, Released September 4, 1998**

Dear Ms. Salas:

On behalf of Sensormatic Electronics Corporation ("Sensormatic"), transmitted herewith is an original and nine copies of Comments in the above-referenced docket. Please date-stamp the return copy and return it to the courier delivering this package.

If there are any questions regarding this matter, please contact the undersigned.

Sincerely yours,

  
Dennis P. Corbett  
Christopher Sova

Enclosure

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Before the  
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In the matter of	}	
	}	
Amendment of Section 15.225 of the	}	RM 9375
Commission's Rules	}	
to Facilitate the Operation of Short-range	}	
Devices in the	}	
13.56 +/- 0.007 MHz Band	}	

**COMMENTS ON  
PETITION FOR RULEMAKING**

Sensormatic Electronics Corporation ("Sensormatic") hereby submits the following comments on the above captioned Petition for Rulemaking ("Petition") filed by the National Council for Information Technology Standardization Technical Committee B10 ("B10") on September 4, 1998, which was placed on public notice October 14, 1998.

Sensormatic is a major manufacturer of devices operating under the Part 15 rules in the United States and has extensive experience with foreign and international standards regarding such devices. Sensormatic manufactures a broad variety of products including asset tracking and protection and access control devices, and is constantly developing new products for introduction into the market. Sensormatic supports the rational use of the spectrum, essentially as proposed by B10 in its Petition, with the limitations set forth herein.

RF identification ("RFID") devices are being developed by many companies around the world. The level of performance and operational range of RFID equipment directly depends on the spectrum restrictions that are imposed globally. As RFID implies in its name, the ability to transfer data is an essential element of the RFID technology.

Sensormatic agrees with B10 that a relaxation in the current Part 15 Rules should be allowed in a reasonable frequency band around 13.56 MHz to permit suitable data transfer rates using appropriate modulation techniques.

Although Sensormatic generally supports B10's Petition, we oppose an unbounded mask. The proposed mask identified in the Petition does not specify an upper and lower frequency bound on the 106 uV/m limit. With no bound specified, there will be a general relaxation of the Part 15 radiated limits. Sensormatic opposes such a relaxation as no justification has been presented. As a frequency bound, Sensormatic suggests that a data rate of 150 kHz can be supported by a bandwidth of +/- 450 kHz at a level of 106 uV/m, when including the 150 kHz bandwidth at a level of 334 uV/m as stated in the Petition. Thus the level would revert to the Part 15, 30 uV/m at a frequency of 13.56 MHz +/- 450 kHz.

#### CONCLUSION

Sensormatic supports B10's Petition subject to the modifications set forth above.



Donald J. Umbdenstock  
Project Leader, Corporate Compliance  
Sensormatic Electronics Corp.

Date: Nov 12, 1998

# Petition for RFID Rule Making

## Comparison

